

To the Honorable Thomas L. Williams Chancellor for the Eastern Division of Tennessee setting in Chancery for District composed of the County of Sevier. Humbly complaining sheweth unto your Honor your oratrix Nancy Trotter a citizen of the County of Sevier in the state of Tennessee, that some time about the 21st day of August 1840 her late husband Wm. Trotter being very old and infirm and unable to attend to the affairs of his family made an arrangement with Samuel Newman who is now a citizen of Knox County by which he expected himself and your oratrix to be amply provided for during the remainder of their lives. In pefsuance of of said arrangement he conveyed to said Newman a tract of land in the county of Sevier on the waters of Flat Creek upon condition and in consideration that said Newman should provide for him & your oratrix during the remainder of their lives. A copy of said conveyance is hereto.... marked (A) and is prayed to be taken as part of this Bill- Your oratrix further states that upon the 11th day of June 1841 hersaid husband made his last will and testament by which he disposed of his other tract of land adjoining aforesaid tract sold to said Newman making no provision for your oratrix whatever relying upon his said arrangement with said Newman wholly for the support of himself and your oratrix and ~~xxxxxx~~ died upon the sixteenth day of August 1841- A copy of said will is hereto exhibited marked (B) and prayed to be taken as part of this bill- Your oratrix further states that about the ___ day of ___ 18__ said Newman sold said home tract of land to a certain Samuel Pate who is a citizen of Sevier County and moved away leaving your oratrix who is very old and infirm and unable to work for a support, to shift on the best terms she can. Your oratrix charges that said Samuel Pate well knew the premises at the time he purchased said land of said Newman and took it subject to the claims of your oratrix for dower & support your oratrix further states that the death of her said husband (who was a revelutionary pensioner) was hastened by the mal treatment of the said Pate and the said Newman, said Samuel Pate came to the house of your oratrix & her husband in March or April 1841, and upon some pretense fell out with her said husband and dealt him such grævous blows as to break many of his bones, and otherwise so disabled him so that he was never able to leave his bed afterward. Your oratrix furtler states that after he said husband was so mutilated and abused, she herself became disabled and the care of her said husband w fell upon said Newman who instead of taking even reasonable care of him so neglected him that the flies made their inroads upon his person and he died inhabited by worms of the most offensive character. And your oratrix further charges that said Pate ~~will~~ knew the fact also at the time he purchased said land from said Newman- Your oratrix further states that said Samuel Pate now threatens to put a tenant into the House with your oratrix or turn her out to make room for a tenant so that without the assistance and protection of your honorable Court she will soon be turned over to the cold charity of the world without even a shelter for her head while others will enjoy the fruits her industry which have been gethered by more than half a centuary of labour and toils. Your oratrix states that said James T Trotter purchased the land sold under the will of her said husband. Your oratrix further states that she did not attend the county court within the six months after the decease of her said husband and enter her Quiscent to said will so as to have dower allotted her out of said lands because she supposed that she would be provided for and taken care of according to said agreement of said Newman said Newman has since taken the benefit of the Bankrupt law as your oratrix is informed and believes, and the only remains your oratrix can now rely upon for a support is a dower of and a

lean upon said lands. Her said husband at the he had sold the home place as above stated remained in possession up to the day of his death- Your oratrix charges that the said Samuel Newman and Samuel Pate who pretends to be a minister of the gospel have most wickedly and uncharitable combined and confederated themselves together to cheat and defraud your oratrix out of her only means of support and that the said Samuel Pate well knew all the facts above stated before and at the time he purchased said land and that he well knew that said Newman was worthless and could not if had been disposed to do so make a support for your oratrix after he sold said land Your oratrix further states that by said will part of said Tract of land adjoining the home place was given to Aramin the wife of said Newman, said Aramin to has since died- Your oratrix charges that the said Newman became tired of the charge of your oratrix and her said husband and that he and said Pate combined themselves together (by abuse & neglect to hasten the death of said Wm Trotter that they would get full possession of said land & be enabled to sell and dispose of the same, and leave your oratrix to the charity of the world; as will more fully appear from the proof which your oratrix hopes to be able to make & have upon the trial of this cause.

The premises considered your oratrix prays that said Samuel Pate & Samuel Newman be made parties hereto with apt words to charge them and also that the said James T. Trotter be made also defendant to this bill & answer the same. And that the said Samuel Newman and Samuel Pate be compelled upon their corporel oaths full perfect and true answers to make to all and singular the matters & things herein charged (fraud and all) as if the same were here again repeated and they distinctly interogated thereto. And that upon the final hearing your Honor will decree that said land be held chargeable with the support of your oratrix during the remainder of her natural life- That dower be allotted her out of said land that the said Pate be enjoined from putting anyone in the house with your oratrix in the possession of the house in which she lived at the time of her said husbands death. And that on the final hearing your oratrix will decree her such other and further relief as the nature of her case under the circumstances above stated will warrant and justify and that subpoenas and injunctions issue.

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Robert M. Anderson, Judge, 6 Dec. 1842
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